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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Criminal No. 16- 229-JMV
	:	
PETER LOCSIN	:	18 U.S.C. § 1349
	:	18 U.S.C. § 1028A(a)(1)
	:	18 U.S.C. § 2

I N D I C T M E N T

The Grand Jury in and for the District of New Jersey, sitting at Newark,
charges:

COUNT ONE
(Conspiracy to Commit Bank Fraud)

Background

1. At all times relevant to this Indictment:
 - a. Defendant PETER LOCSIN was a resident of the Philippines.
 - b. Financial Institution Victim 1 was a multinational banking and financial services corporation.
 - c. Financial Institution Victim 2 was a multinational banking and financial services corporation.
 - d. Financial Institution Victim 3 was a multinational banking and financial services inter-insurance exchange.
 - e. Each of Financial Institution Victims 1, 2, and 3 had deposits which were insured by the Federal Deposit Insurance Corporation.
 - f. Victim Company A was a multinational payment processing

corporation.

- g. Individual Victim 1 was a resident of New Jersey.
- h. Individual Victim 2 was a resident of New Jersey.
- i. Individual Victim 3 was a well-known socialite and entertainer.
- j. Individual Victim 4 was the Chief Executive Officer of a multinational corporation.
- k. Individual Victim 5 was a former high-ranking United States government official.

Overview of the Conspiracy

2. From in or about February 2012 through in or about January 2015, defendant PETER LOCSIN and his co-conspirators (collectively, the “Co-Conspirators”) devised a scheme to defraud Financial Institution Victims 1, 2, and 3, among others (the “Financial Institution Victims”), by compromising accounts held at those institutions by Individual Victims 1, 2, 3, 4, and 5, among other well-known or celebrity account holders (the “Individual Victims”).

The Conspiracy

3. From in or about February 2012 through in or about January 2015, in Essex and Morris Counties, in the District of New Jersey, and elsewhere, defendant

PETER LOCSIN

did knowingly and intentionally conspire and agree with others to devise a scheme and artifice to defraud Financial Institution Victim 1, Financial

Institution Victim 2, and Financial Institution Victim 3, all financial institutions as defined in Title 18, United States Code, Section 20, and to obtain money, funds and assets owned by and under the custody and control thereof, by means of materially false and fraudulent pretenses, representations and promises, contrary to Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1349.

Object of the Conspiracy

4. It was the object of the conspiracy for defendant LOCSIN and his Co-Conspirators to profit unlawfully by using the Individual Victims' personal identification information ("PII") to fraudulently gain access to the Individual Victims' accounts and obtain, and attempt to obtain, money and other things of value held by the Financial Institution Victims.

Manner and Means of the Conspiracy

5. It was part of the scheme and artifice to defraud that the Co-Conspirators first compromised PII (including names, dates of birth, social security numbers, address history, and work history) of the Individual Victims, using social engineering and other techniques.

6. It was further part of the scheme and artifice to defraud that the Co-Conspirators fraudulently accessed the accounts of these Individual Victims held at the Financial Institution Victims through websites or other online means, as well as through telephone calls.

7. It was further part of the scheme and artifice to defraud that the

Co-Conspirators used those accounts to make or attempt to make wire transfers of funds, order merchandise, order emergency replacement cards, add supplemental card holders to accounts, and/or change addresses related to those accounts, among other things. None of these actions were authorized by the Individual Victims. As just some examples:

- a. On or about February 4, 2012, defendant LOCSIN, using the PII of Individual Victim 1, called Financial Institution Victim 1 to reset the password for Individual Victim 1's online bank account (the "Individual Victim 1 Account").
- b. On or about February 6, 2012, a wire transfer of approximately \$11,000 was made from the Individual Victim 1 Account to a bank account in the name of defendant LOCSIN. Access to the account was gained from an Internet Protocol ("IP") address used by defendant LOCSIN.
- c. On or about March 8, 2012, a replacement credit card for the Individual Victim 1 Account was requested, via phone, to be sent to an address in the Philippines controlled by defendant LOCSIN.
- d. Between on or about August 14, 2012 and on or about September 5, 2012, defendant LOCSIN and other Co-Conspirators made approximately 13 attempts to wire transfer money from the Individual Victim 1 Account to a bank account controlled by defendant LOCSIN.

- e. On or about March 28, 2013, defendant LOCSIN created an account at Victim Company A ending in 4470 (the "4470 Account").
- f. On or about March 28, 2013, defendant LOCSIN added a bank account held at Financial Institution Victim 2, in the name of Individual Victim 3 (the "Individual Victim 3 Account"), to the 4470 Account.
- g. On or about March 31, 2013, defendant LOCSIN and other Co-Conspirators attempted to make payments out of the 4470 Account using the Individual Victim 3 Account.
- h. On or about April 22, 2013, defendant LOCSIN and other Co-Conspirators created an online account at Financial Institution Victim 2 for Individual Victim 2. Individual Victim 2 does not use, and has never used, online banking services.
- i. In or around April 2013, defendant LOCSIN and other Co-Conspirators called Financial Institution Victim 1 and Financial Institution Victim 2 approximately 33 times to attempt to gain access to bank accounts in the names of Individual Victim 2 and Individual Victim 4, and to have replacement cards for these Individual Victims sent to addresses controlled by defendant LOCSIN.
- j. On or about November 13, 2013, defendant LOCSIN and other Co-Conspirators attempted to transfer approximately \$15,000 from

a bank account held at Financial Institution Victim 3 in the name of Individual Victim 5 to an address controlled by defendant LOCSIN.

k. On or about November 14, 2013, another similar attempt was made, this time to transfer approximately \$10,000 from a bank account held at Financial Institution Victim 3 in the name of Individual Victim 5 to an address controlled by defendant LOCSIN.

l. On or about April 22, 2013, defendant LOCSIN and other Co-Conspirators successfully, and fraudulently, established online access for Individual Victim 2 at Financial Institution Victim 1.

m. On or about April 23, 2013, defendant LOCSIN and others attempted to transfer approximately \$50,000 from Individual Victim 2's bank account held at Financial Institution 2 to another account.

All in violation of Title 18, United States Code, Section 1349.

COUNTS TWO AND THREE
(Aggravated Identity Theft)

1. The allegations set forth in paragraphs 1, 2, and and 5 through 7 of Count One of this Indictment are realleged and incorporated as if set forth herein.

2. On or about the dates set forth below, in the District of New Jersey, and elsewhere, defendant

PETER LOCSIN

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another individual, during and in relation to a felony violation of a provision contained in Chapter 63 of the United States Code, that is, conspiracy to commit bank fraud in violation of Title 18, United States Code, Section 1349, charged in Count One of this Indictment, as set forth below:

Count	Approximate Date	Description
Two	February 4, 2012	Defendant LOCSIN and other Co-Conspirators used the PII of Individual Victim 1, who resided in New Jersey, specifically, Individual Victim 1's social security number, to reset the password for the Individual Victim 1 Account
Three	April 22, 2013	Defendant LOCSIN and other Co-Conspirators created an online account at Financial Institution Victim 2 for Individual Victim 2 using the PII of Individual Victim 2, specifically, Individual Victim 2's social security number.

In violation of Title 18, United States Code, Section 1028A(a)(1), and Title 18, United States Code, Section 2.

Forfeiture Allegations

1. The allegations contained in Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of noticing forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).


2. The United States hereby gives notice to the defendant that, upon conviction of the offenses charged in Count One, the government will seek forfeiture, in accordance with Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), of any and all property, real or personal, that constitutes or is derived from proceeds traceable to the violations of Title 18, United States Code, Section 1349, alleged in Count One of this Indictment.

Substitute Assets Provision

3. If by any act or omission of the defendant, any of the property subject to forfeiture described above:

- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party,
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be subdivided
- without difficulty, the United States of America will be entitled to forfeiture of substitute property up to the value of the property described above, pursuant to

Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).



PAUL J. FISHMAN
UNITED STATES ATTORNEY

CASE NUMBER: 16- 229 - Jmv

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

PETER LOCSIN

INDICTMENT FOR
18 U.S.C. §§ 1349, 1028A & 2

A True Bill,

/ Foreperson

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